

Exhibit E

**BY SAME DAY COURIER**

Cleary Gottlieb Steen & Hamilton LLP
City Place House
55 Basinghall Street
London
EC2V 5EH

Your Ref: JK/PB/28205-155

Our Ref: PMZD/CZH/FLI00290/5

Please quote this when replying

Date: 03 August 2015

Please ask for: Phil Duignan

Ext: 842305

Direct Dial: 0161 838 0305

E-mail: Phil.Duignan@dwf.co.uk

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Dear Sirs

Our Clients: Begbies Traynor (Investigations) Limited (formerly BTG Intelligence Limited) ("BTG") and John Humphrey ("Mr Humphrey")

In the matter of The Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters

Re: Rio Tinto plc v Vale S.A., et al – Order for document production dated 28 April 2015

Order dated 30 June 2015

We write further in respect of the above matter, and further to the service of the third witness statement of John Ashton Humphrey dated 27 July 2015.

Further to Mr Humphrey's third statement, we have now completed the review of the unique document "hits" resulting from the application of your suggested keyword search. Please therefore find enclosed under cover of this letter nine lever arch files which contain the documents that are disclosable under the Order of Master Eastman dated 28 February 2015, as amended by the Order of Mrs Justice Richards DBE dated 30 June 2015.

In accordance with paragraph 19 of Mrs Justice Richards' Order, and as set out in Mr Humphrey's statement, we have redacted parts of the documents disclosed where reference is made to a source or potential source of information. We therefore also enclose a list of the sources as redacted, with anonymised references describing the apparent role of the individuals as we understand it from the documents.

As explained in Mr Humphrey's third statement, our client is unable to be categorically sure of which of the listed sources were promised and are therefore owed a duty of confidentiality by our client, and which are sources whose identity could be potentially disclosed. This is due to the fact that, as we have previously set

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out, the individuals who would be able to provide clarity on this are Mr Brown and Mr Leighton, who have long since left our client's employment. Both have again been approached by our client and asked to provide assistance with this exercise, but unfortunately each has again confirmed that they are not willing to assist. The option of course remains for your client to approach Mr Brown and Mr Leighton directly should you require any further clarification on this point.

Once your client has had the opportunity to consider the documents disclosed under the terms of the Orders, we should be grateful if you would confirm whether it is still necessary for Mr Humphrey to attend for examination, or if this is no longer required.

As previously set out, it is our client's position and that under the terms of Master Eastman's Order the costs of reviewing and producing these documents are to be met by your client. We will provide a summary figure of the total costs of the exercise to date in due course.

We should be grateful if you would acknowledge safe receipt of this letter and its enclosures.

We look forward to hearing from you.

Yours faithfully

A handwritten signature in black ink, appearing to read "DWF LLP", written in a cursive style.

DWF LLP

Encs

VALE S.A – BEGBIES TRAYNOR 3RD PARTY DISCLOSURE ORDER –SOURCE LIST

- **SOURCE A** – French Lawyer linked to Consultant Investigatory Firm
- **SOURCE B** – Investigator at Consultant Investigatory Firm based in Israel
- **SOURCE C** - Investigator at Consultant Investigatory Firm based in Israel
- **SOURCE D** – A Guinee Diplomat
- **SOURCE E** - Investigator at Consultant Investigatory Firm – location not clear
- **SOURCE F** - Investigator at Consultant Investigatory Firm – location not clear
- **SOURCE G** - Lawyer contact – location not clear
- **SOURCE H** - Lawyer contact – location not clear
- **SOURCE I** - referred to as 'US Partner'
- **SOURCE J** -- appears to be named as a primary source name
- **SOURCE K** - Investigator at Consultant Investigatory Firm – location not clear
- **SOURCE L** – sent invoices for what appear to be consultancy services but could have been a source also.
- **SOURCE M** - Investigator at Consultant Investigatory Firm – location not clear
- **SOURCE N** – Investigator at Consultant Investigatory Firm – location not clear
- **SOURCE O** – Third Party Consultant Investigatory Firm – based in the UK
- **SOURCE P** – Appears to be named as a primary source name
- **SOURCE Q** – Former Senior Government Official in Guinea